

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RE-  
TARDATION AND DEVELOPMENTAL  
DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' INTERROGATO-  
RIES TO SURESH ARYA, IN HIS  
PERSONAL AND OFFICIAL CA-  
PACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that SURESH ARYA, personally and in his official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Suresh Arya, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

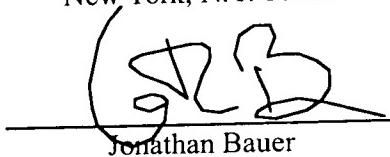
(D) Documents, where produced, shall be identified by reference to Bates numbers.

**INTERROGATORIES**

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Suresh Arya, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Suresh Arya, in his official capacity from January 1, 1999, up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Interrogatories were served upon the following by first class United States Postal Service Mail on December 22, 2007:

Office of the Attorney General  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETARDATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' INTERROGATORIES TO KATHLEEN FERDINAND, IN HER PERSONAL AND OFFICIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that KATHLEEN FERDINAND, personally and in her official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Kathleen Ferdinand, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

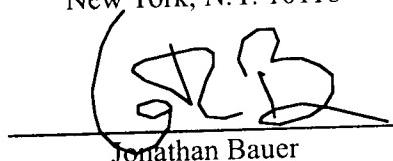
(D) Documents, where produced, shall be identified by reference to Bates numbers.

### **INTERROGATORIES**

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Kathleen Ferdinand, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Kathleen Ferdinand, in her official capacity, from January 1, 1999 up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118

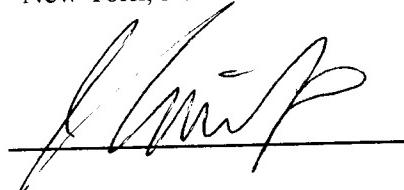


Jonathan Bauer

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Office of the Attorney General  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

Case No.: 07cv06241 (LAK)

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RE-  
TARDATION AND DEVELOPMENTAL  
DISABILITIES, *et al.*,

**PLAINTIFFS' INTERROGATO-  
RIES TO GLORIA HAYES, IN  
HER PERSONAL AND OFFICIAL  
CAPACITIES**

defendants.

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that GLORIA HAYES, personally and in her official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Gloria Hayes, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

(D) Documents, where produced, shall be identified by reference to Bates numbers.

### INTERROGATORIES

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Gloria Hayes, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Gloria Hayes, in her official capacity, from January 1, 1999 up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118

  
\_\_\_\_\_  
Jonathan Bauer

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Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

Case No.: 07cv06241 (LAK)

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETARDATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

**PLAINTIFFS' INTERROGATORIES TO JOVAN MILOS, IN HIS PERSONAL AND OFFICIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that JOVAN MILOS, personally and in his official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Jovan Milos, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

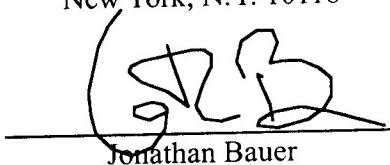
(D) Documents, where produced, shall be identified by reference to Bates numbers.

### INTERROGATORIES

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Jovan Milos, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Jovan Milos in his official capacity from January 1, 1999, up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



\_\_\_\_\_  
Jonathan Bauer

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Office of the Attorney General  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

Case No.: 07cv06241 (LAK)

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RE-TARDATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

**PLAINTIFFS' INTERROGATORIES TO PETER USCHAKOW, IN HIS PERSONAL AND OFFICIAL CAPACITIES**

defendants.

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that PETER USCHAKOW, personally and in his official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Peter Uschakow, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

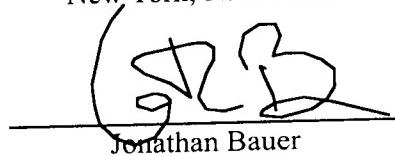
(D) Documents, where produced, shall be identified by reference to Bates numbers.

### INTERROGATORIES

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Peter Uschakow, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Peter Uschakow, in his official capacity, from January 1, 1999 up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



Jonathan Bauer

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Office of the Attorney General  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

Case No.: 07cv06241 (LAK)

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RE-  
TARDATION AND DEVELOPMENTAL  
DISABILITIES, *et al.*,

**PLAINTIFFS' INTERROGATO-  
RIES TO JAN WILLIAMSON, IN  
HER PERSONAL AND OFFICIAL  
CAPACITIES**

defendants.

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that JAN WILLIAMSON, personally and in her official capacity, answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

- (A) "You" or "Yours" means Jan Williamson, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (C) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2, 26.3, 26.3, 33.1 and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

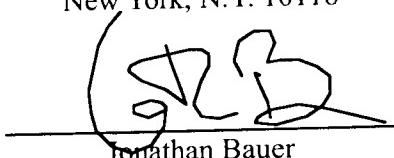
(D) Documents, where produced, shall be identified by reference to Bates numbers.

### INTERROGATORIES

- 1 Identify all documents or electronically stored information concerning or relating to plaintiffs' decedent, Valerie Young, created, maintained, filed or otherwise stored by Jan Williamson, personally, from January 1, 1999 up to and including the date this interrogatory is answered.
- 2 Identify all documents or electronically stored information concerning or relating to Valerie Young, created, maintained, filed or otherwise stored by Jan Williamson, in her official capacity, from January 1, 1999 up to and including the date this interrogatory is answered.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



Jonathan Bauer

### Certificate of Service

I hereby certify that the within Interrogatories were served upon the following by first class United States Postal Service Mail on December 22, 2007:

Office of the Attorney General  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO SURESH  
ARYA, IN HIS PERSONAL  
AND OFFICIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that SURESH ARYA respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

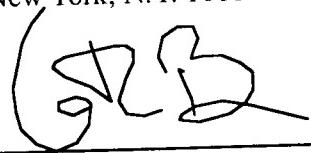
- (A) "You" or "Yours" means Suresh Arya, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 and 26.3 are hereby incorporated herein.

**REQUESTS FOR PRODUCTION**

- (1) All documents or electronically stored information identified in your answers to plaintiffs' December 22, 2007 interrogatories, not previously produced.
- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



\_\_\_\_\_  
Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on December 22, 2007:

State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

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Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO  
KATHLEEN FERDINAND, IN  
HER PERSONAL AND OFFI-  
CIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that KATHLEEN FERDINAND respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

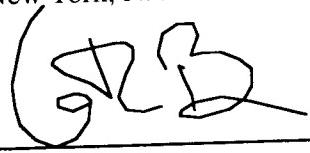
- (A) "You" or "Yours" means Kathleen Ferdinand, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 and 26.3 are hereby incorporated herein.

**REQUESTS FOR PRODUCTION**

- (1) All documents or electronically stored information identified in your answers to plaintiffs' December 22, 2007 interrogatories, not previously produced.
- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



\_\_\_\_\_  
Jonathan Bauer

**Certificate of Service**

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State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
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Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO GLORIA  
HAYES, IN HER PERSONAL  
AND OFFICIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that GLORIA HAYES respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

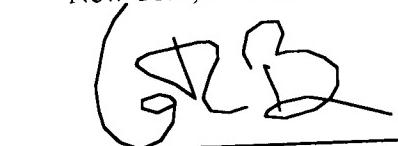
- (A) "You" or "Yours" means Gloria Hayes, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 and 26.3 are hereby incorporated herein.

**REQUESTS FOR PRODUCTION**

- (1) All documents or electronically stored information identified in your answers to plaintiffs' December 22, 2007 interrogatories, not previously produced.
- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



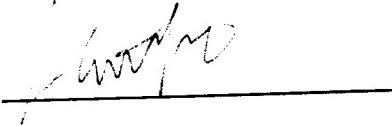
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Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on December 22, 2007:

State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO JOVAN  
MILOS, IN HIS PERSONAL  
AND OFFICIAL CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that JOVAN MILOS respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

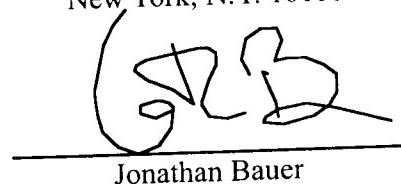
- (A) "You" or "Yours" means Jovan Milos, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 and 26.3 are hereby incorporated herein.

**REQUESTS FOR PRODUCTION**

- (1) All documents or electronically stored information identified in your answers to plaintiffs' December 22, 2007 interrogatories, not previously produced.
- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118

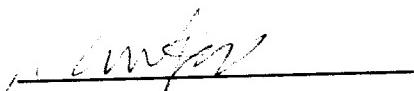


Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on December 22, 2007:

State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO PETER  
USCHAKOW, IN HIS PER-  
SONAL AND OFFICIAL  
CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that PETER USCHAKOW respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

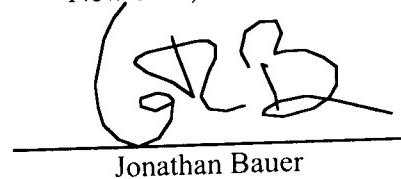
- (A) "You" or "Yours" means Peter Uschakow, personally and in his official capacity, his agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 and 26.3 are hereby incorporated herein.

**REQUESTS FOR PRODUCTION**

- (1) All documents or electronically stored information identified in your answers to plaintiffs' December 22, 2007 interrogatories, not previously produced.
- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on December 22, 2007:

State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, *et al.*,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-  
DATION AND DEVELOPMENTAL DISABILITIES, *et al.*,

defendants.

Case No.: 07cv06241 (LAK)

**PLAINTIFFS' REQUEST  
FOR PRODUCTION OF  
DOCUMENTS, ELEC-  
TRONICALLY STORED  
INFORMATION AND TAN-  
GIBLE THINGS TO JAN  
WILLIAMSON, IN HER  
PERSONAL AND OFFICIAL  
CAPACITIES**

**PLEASE TAKE NOTICE** that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that JAN WILLIAMSON respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

**INSTRUCTIONS AND DEFINITIONS**

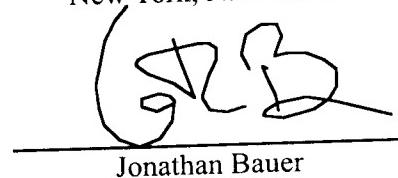
- (A) "You" or "Yours" means Jan Williamson, personally and in her official capacity, her agents, servants and/or employees.
- (B) "Documents" or "electronically stored information" include, by example and not by limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained.
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- (2) A privilege log describing and identifying each document for which you assert a privilege, in whole or in part, including any document with redacted material.

Dated: New York, New York  
December 22, 2007

Catafago Law Firm, P.C. &  
Jonathan Bauer  
*Attorneys for Plaintiff*  
Empire State Building  
350 Fifth Ave. Suite 4810  
New York, N.Y. 10118



Jonathan Bauer

**Certificate of Service**

I hereby certify that the within Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on December 22, 2007:

State of New York  
Office of the Attorney General  
*Attorneys for Defendants*  
Jose Velez, Esq. Assistant Attorney General  
120 Broadway  
New York, N.Y. 10271-0332

